

January 30, 2006

National Credit Union Administration  
Mary Rupp, Secretary of the Board  
1775 Duke Street  
Alexandria, VA 22314-3428

RE: Request for Comment: Economic Growth and Regulatory Paperwork Reduction  
Act of 1996 06-EA-03

Dear Ms. Rupp:

We have reviewed the summary of proposed amendments to NCUA's Economic Growth and Regulatory Paperwork Reduction Act of 1996 (Rules Relating to Agency programs, Capital and Corporate Credit Unions) and our comments are as follows:

We support the current risk based capital proposal, which might modify regulation 702.

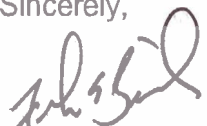
We feel that part 702 requiring "adequately capitalized" credit unions to begin corrective actions under PCA inhibits growth for all credit unions.

We do not feel that the cost of compliance associated with reporting, recordkeeping, and disclosure requirements of the regulations could be improved.

We do not feel that any of the regulations are unclear.

Establishing RBNW can be complicated depending on expertise in small credit unions.

Sincerely,

  
Frank E. Berrish  
President/CEO

